

STATE OF COLORADO

**COLORADO DEPARTMENT OF HEALTH**

*Dedicated to protecting and improving the health and environment of the people of Colorado*

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Roy Romer  
Governor

Patricia A. Nolan, MD MPH  
Executive Director



March 31, 1994

Mr Richard J Schassburger  
U S Department of Energy  
Rocky Flats Office, Bldg 116  
P O Box 928  
Golden, Colorado 80402-0928

RE: Comments - Draft Phase I RFI/RI Technical Memorandum No. 1, Rocky Flats Plant  
Inside Building Closures (Operable Unit 15) February 1994

Dear Mr Schassburger,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document submitted by DOE and prime operating contractor, EG&G. The Division's comments are attached. Comments from the EPA will be forwarded under separate cover on receipt by the Division.

The Division is generally pleased with this draft submittal. However, as discussed at the March 17, 1994 meeting with your staff, some regulatory and technical issues must be incorporated into this document in order to make a complete determination on the need for verification sampling, which will be used to certify attainment of Clean Closure Performance Standards at several OU 15 IHSSs.

These issues are discussed in detail in the attached comments. Included are discussions of the collection of additional equipment blanks to verify the hypothesis that phthalates in steam rinse samples are associated with sampling hoses, evaluation of data usability and QA/QC samples, and modification to the decision logic for determining the need for verification sampling to meet the clean closure performance standards.

The Division commends DOE and EG&G for the continued cooperation and open communication on OU-15. The Division recognizes that concurrent review of this document with DOE is a major step toward streamlining the review process.

If you have any questions, please call Jeff Swanson of my staff at 692-3416

Sincerely,

Sincerely,  


Gary W Baughman, Chief  
Facilities Section  
Hazardous Waste Control Program

cc Martin Hestmark, EPA  
Bill Fitch, DOE  
~~Dennis Schutte~~, EG&G  
Steve Tarlton, CDH-OE

## ADMIN RECORD